

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Timothy A. Stewart  
Gretchen W. Stewart

Debtor(s)

Timothy A. Stewart  
Gretchen W. Stewart

Movants

v.

Freedom Mortgage Corporation  
Ronda J. Winnecour, Trustee

Respondents

BK. NO. 15-23443 CMB

CHAPTER 13

Related to Document No. 80, 83

**CONSENT ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the follow Consent Order:

WHEREAS, Movants filed a Motion to Enforce Trustee's Report of Receipts and Disbursements, Notice of Final Cure Payment, and Discharge Order along with Request for Payment of Legal Fees and Expenses on April 19, 2021 (Doc. 80);

WHEREAS, Respondent filed a response on May 6, 2021 (Doc. 83);

WHEREAS, a hearing is scheduled for May 25, 2021 at 1:30 p.m;

WHEREAS, the parties have discussed this matter in depth and hereby enter into this Consent Order to resolve the Motion to Enforce.

AND NOW, it is hereby stipulated by and between the undersigned as follows:

1. Debtors were contractually due for 12/1/2020 as of 11/15/2020.
2. Debtors are contractually due for the 7/1/2021 payment as of 6/15/2021.
3. Within 14 days of this consent order, Respondent will provide the Debtor's with a corrected loan history.
4. Respondent will remove all late fees.

5. Respondent and debtor will look at the escrow disbursements made for 2020 to present to ensure they accurate.

6. Within 30 days of this Consent Order, Respondent agrees to submit a Uniform Data Form to any credit bureau that it has reported on the subject loan to correct any entries indicating that the loan was delinquent.

7. Respondent shall pay counsel fees in the amount of \$1,500 within 14 days of receipt of an executed W-9.

Consented to by:

**/s/ Christopher M. Frye**

Christopher M. Frye, Esq., PA ID 208402  
Steidl & Steinberg  
Suite 2830-Gulf Tower, 707 Grant St.  
Pittsburgh, PA 15219  
Phone: (412) 391-8000  
Email: chris.frye@steidl-steinberg.com  
Dated: 6/21/2021

**/s/ Brian C. Nicholas**

Brian C. Nicholas, Esq., PA ID 317240  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: (201-549-5366)  
Email: bnicholas@kmlawgroup.com  
Dated: 6/21/2021

It is hereby ORDERED that the parties' Consent Order be and hereby is APPROVED.

By the Court,

\_\_\_\_\_. J.